

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH LEON WILCOX,

Defendant.

INDICTMENT

CR 10-173 MJD/JJG

(18 U.S.C. § 2251(a))

(18 U.S.C. § 2251(e))

(18 U.S.C. § 2253(a))

(18 U.S.C. § 2423(a))

(18 U.S.C. § 2428)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Transportation of a Minor with Intent To Engage in Criminal
Sexual Activity)

On or about October 20, 2007, in the State and District of
Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did knowingly transport B.L.C., an individual who had not attained
the age of 18 years, in interstate commerce, from the State of
Minnesota to the State of Wisconsin, with the intent that B.L.C.
engage in sexual activity for which a person can be charged with a
criminal offense, all in violation of Title 18, United States Code,
Section 2423(a).

COUNT 2

(Production of Child Pornography)

On or about October 20, 2007, in the State and District of
Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did employ, use, persuade, induce, entice, and coerce B.L.C., a
minor, to engage in sexually explicit conduct for the purpose of

SCANNED

JUN 17 2010

U.S. DISTRICT COURT ST. PAUL

FILED JUN 15 2010

RICHARD D. SLETTEN

JUDGMENT ENTD

DEPUTY CLERK

U.S. v. Kenneth Leon Wilcox

producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, including but not limited to a Sony Handy Cam video tape recorder and a Sony Hi 8mm video tape, and which visual depiction was transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 3

(Transportation of a Minor with Intent To Engage in Criminal Sexual Activity)

On or about December 2, 2007, in the State and District of Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did knowingly transport B.L.C., an individual who had not attained the age of 18 years, in interstate commerce, from the State of Minnesota to the State of West Virginia, with the intent that B.L.C. engage in sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2423(a).

COUNT 4

(Production of Child Pornography)

On or about December 2, 2007, in the State and District of Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did employ, use, persuade, induce, entice, and coerce B.L.C., a

U.S. v. Kenneth Leon Wilcox

minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, including but not limited to a Sony Handy Cam video tape recorder and a Sony Hi 8mm video tape, and which visual depiction was transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 5

(Transportation of a Minor with Intent To Engage in Criminal Sexual Activity)

On or about February 4, 2008, in the State and District of Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did knowingly transport B.L.C., an individual who had not attained the age of 18 years, in interstate commerce, from the State of Minnesota to the State of Virginia, with the intent that B.L.C. engage in sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2423(a).

COUNT 6

(Production of Child Pornography)

On or about February 4, 2008, in the State and District of Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

U.S. v. Kenneth Leon Wilcox

did employ, use, persuade, induce, entice, and coerce B.L.C., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, including but not limited to a Sony Handy Cam video tape recorder and a Sony Hi 8mm video tape, and which visual depiction was transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 7

(Transportation of a Minor with Intent To Engage in Criminal Sexual Activity)

On or about March 11, 2008, in the State and District of Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did knowingly transport B.L.C., an individual who had not attained the age of 18 years, in interstate commerce, from the State of Minnesota to the State of Maryland, with the intent that B.L.C. engage in sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2423(a).

COUNT 8

(Production of Child Pornography)

On or about March 11, 2008, in the State and District of Minnesota and elsewhere, the defendant,

U.S. v. Kenneth Leon Wilcox

KENNETH LEON WILCOX,

did employ, use, persuade, induce, entice, and coerce B.L.C., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, including but not limited to a Sony Handy Cam video tape recorder and a Sony Hi 8mm video tape, and which visual depiction was transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 9

(Transportation of a Minor with Intent To Engage in Criminal Sexual Activity)

On or about March 30, 2008, in the State and District of Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did knowingly transport B.L.C., an individual who had not attained the age of 18 years, in interstate commerce, from the State of Minnesota to the State of Ohio, with the intent that B.L.C. engage in sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2423(a).

U.S. v. Kenneth Leon Wilcox

COUNT 10

(Production of Child Pornography)

On or about March 30, 2008, in the State and District of Minnesota and elsewhere, the defendant,

KENNETH LEON WILCOX,

did employ, use, persuade, induce, entice, and coerce B.L.C., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, including but not limited to a Sony Handy Cam video tape recorder and a Sony Hi 8mm video tape, and which visual depiction was transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

FORFEITURE ALLEGATION

Counts 1 through 10 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 2253(a) and 2428.

As a result of the offenses alleged in Counts 1, 3, 5, 7, and 9 of the Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses, and any

U.S. v. Kenneth Leon Wilcox

property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of the offenses.

As a result of the offenses alleged in Counts 2, 4, 6, 8 and 10 of the Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including a Sony Handy Cam video tape recorder, model HI 8 CCD-TRV67, serial number 240694.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

U.S. v. Kenneth Leon Wilcox

All in violation of Title 18, United States Code, Sections
2251(a), 2251(e), 2253(a) and 2428.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON